



Whistleblower Policy

Document Control

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Change History

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This document is approved and authorised for application.

The Board of Education Careers is committed to a free and open culture in dealings between its employees, customers, suppliers and all people with whom the Group engages in business relations.

The Board recognises that effective and honest communication is essential to maintain our business values and to ensure that instances of business malpractice are detected and dealt with.

Purpose

The purpose of this policy is to encourage everyone, whether they are full time or part time employees, associates, or customers of the Group, to report any business misconduct without risk to themselves.

Policy

This policy will apply in cases where you genuinely and in good faith believe that business misconduct is occurring, has occurred or may occur within Education Careers.

Below are some examples of business misconduct:

- a criminal offence
- a person not complying with any legal obligation
- the use of deception to obtain an unjust or illegal financial advantage for the business unit or personally;
- a miscarriage of justice;
- danger to the health and safety of an individual
- damage to the environment;
- intentional misrepresentation directly or indirectly affecting financial statements;
- serious non-professional or non-ethical behaviour including harassment and bullying; and
- deliberate concealment of information relating to any of the above

Procedure

1. The Whistleblower should promptly report the suspected or actual event to his/her Line Manager. A protected disclosure can also made to the relevant body without reporting it internally first.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her Line Manager, then the Whistleblower could report the event to the next highest or another level of management.
3. The Whistleblower can report the event with his/her identify or anonymously.

4. The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organisation.
5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of employee or contractual relationship, or other legal means to protect the reputation of the organisation and members of its staff.
6. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination of employee status.
7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
8. Managers who receive the reports must promptly act to investigate and/or resolve the issue.
9. The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.
10. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
11. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organisation are subject to subpoena.